

EXHIBIT A
"TIME CAPSULE" BOX NO. 3

AFFIDAVIT

“My name is Thomas J. Crane; I am over the age of eighteen, and am capable of providing this statement and affidavit. I am an attorney licensed in the state of Texas. I have been licensed in Texas since 1989. I am admitted to the Western District of Texas and the Fifth Circuit Court of Appeals.

“I represent the Albert Sidney Johnston Chapter No. 2060, Robin Terrazas and Jean Lane in Cause No. SA-17-CV-1072-DAE. I have represented the Plaintiffs in this lawsuit since it was filed. My office received the attached photo from Defendant, the City of San Antonio. My office has maintained these discovery documents since receipt. A correct copy of this discovery document is attached. I created the second picture, a “screen shot,” using commonly available computer technology based on the photo produced by the City.

“I declare under penalty of perjury that the above statement is true and correct. I have been given an opportunity to review this statement and to make any necessary changes.”

Signed on June 26, 2018.

Thomas J. Crane
Thomas J. Crane



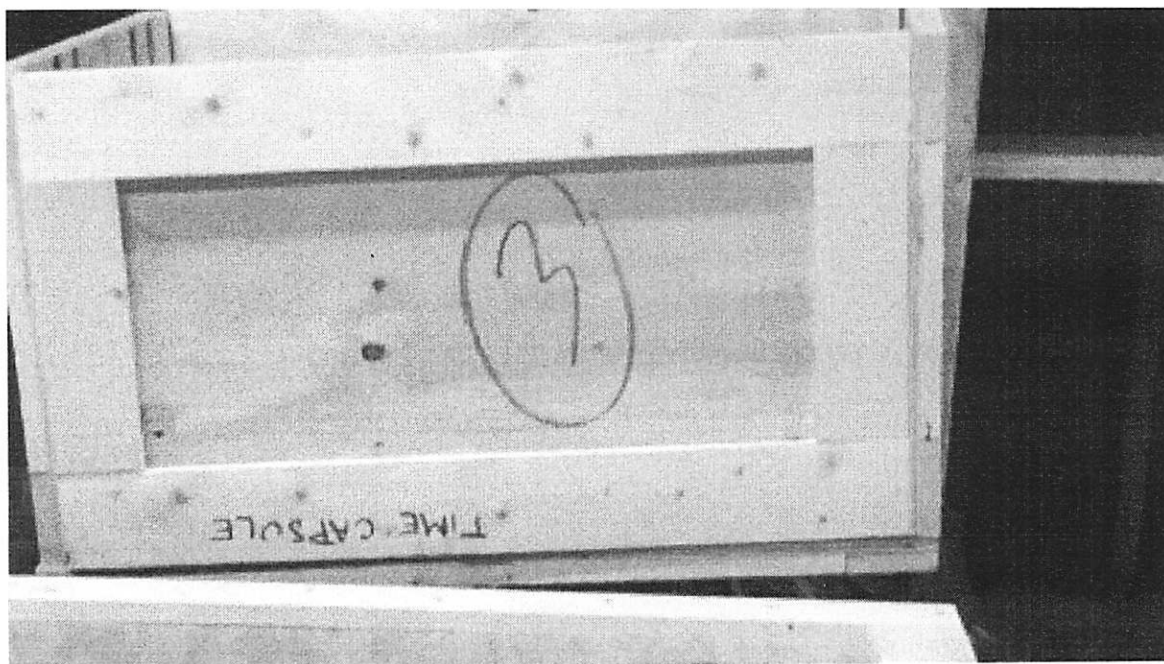


EXHIBIT B
ROBIN TERRAZAS AFFIDAVIT
DEC. 21, 2017

AFFIDAVIT

“My name is Robin Terrazas; I am over the age of eighteen, and am capable of providing this statement and affidavit.

“I am providing this statement and affidavit of my own personal knowledge, freely and willingly, as part of a lawsuit filed by the Albert Sidney Johnston chapter, No. 2060 against the City of San Antonio.

“I am the President of the Albert Sidney Johnston chapter No. 2060. I have held that position since 2016. As President, I am responsible for the meetings and the various committees, as well as spokesman for the chapter. The ASJ chapter No. 2060 succeeded to the Barnard E. Bee chapter in 1972. When Barnard Bee dissolved in 1972, the last president of that chapter, Mrs. Oldham, and two other members visited our chapter and presented a certified copy of the city ordinance giving us permission to erect our monument in the center of Travis Park. They did so should anything arise in the future. The chapter also transferred its cemetery deeds to us. I do not know what happened to the Barnard Bee minutes at that time. Mrs. Oldham and the other two members joined our chapter later that same year.

“I attempted to discuss the Travis park monument with the City of San Antonio several times. On Aug. 3, 2017, Jacquelyn Salvador, Librarian Assistant, Office of City of San Antonio, Municipal Archives and Records, sent me and other UDC officials an email asking about the Barnard Bee chapter, its fund-raising for the monument and a deed of the property beneath the monument. I told her the Barnard Bee chapter had disbanded and named the ASJ chapter as their successor. I asked the City to put things on hold while I researched her questions.

“On Aug. 4, I sent Jacquelyn a copy of the Petition and the Ordinance dated 1899, in which the City gave us use of the land beneath the monument. Jacquelyn mentioned a deed. I asked her about that. She sent me a copy of a deed to the cemetery which the UDC owns. I sent her information about the Barnard Bee chapter and that we succeeded to the Barnard Bee chapter.

“On Aug. 7, 2017, I emailed the Mayor and all the City Council members facts and history of the monument. On Aug. 16, I spoke to the entire City Council about the

monument. I only had 3 minutes like everyone else, but tried to tell them about the history of the monument in that small amount of time. I told them I was the President of the San Antonio chapter of the United Daughters of the Confederacy. Some of the members seemed to look away as I spoke, especially when they heard me denounce racism and white supremacy. I did not feel like they were listening to me.

“A couple of weeks later, I emailed all the members of the City Council and the mayor and said removing the monument was censorship. On Aug. 29, I tried to call the Mayor. When I could not reach him by phone, I went down to City Hall and spoke with his secretary, Alice. I explained to her the urgency of speaking with him since the ownership of Travis Park was questionable. She said the Mayor could not meet with me, but his policy adviser would probably call me. Policy Advisor Marisa Bono called me later that day. I told her that I was the chapter president of the local United Daughters of the Confederacy and felt it was important that I speak with the city regarding the monument. She encouraged me to appear before the City Council like anyone else during the citizens hearing. On Aug. 30, I appeared before the City Council along with some 130 other persons. I had two minutes to speak. I told them who I was and again. Most of them seemed to be looking away and not listening as I told the City Council that we opposed racism and white supremacy, too. I pointed out that no one from the council had contacted us regarding the issue and asked them to please contact us.

“After the meeting, I waited to speak with Mayor Nirenberg. It was about 11:30 p.m. I said, “let’s work together” on this, meaning on what to do with the monument. He shook my hand and looked me in the eye and said, “We will definitely include you.” He knew I was the President of the ASJ chapter, so I assumed he meant he would include the chapter in discussing what to do with the monument.

“The next day, the City Council voted to remove the monument. I called Ms. Bono and left her a phone message. In that message, I told her there was a time capsule in the base of the monument. They are small items. I told her we wanted those items. They would fit in my car, I told her. The time capsule was not part of the decision to remove the statue. So, I just assumed they would hold them for us or tell me how I could get them later. Those items should belong to us, since my organization put them in the monument

back in 1899.

“I did not hear back from Ms. Bono. I called again on Sept. 1, 2017. I left another message asking her to call me. I called the Mayor’s office. Alice said he was gone and the entire City Council was gone for the long weekend. This was a Friday. Alice suggested I send the mayor an email, which I did.

“A few days later, I sent another email to the Mayor, copied Bruce Davidson, the Communication Director and his assistant, Maria Cesar. Both Mr. Davidson and Ms. Cesar were listed as people to contact about Travis Park. I also copied Sheryl Sculley. The City Manager. No one ever responded to my emails. No one ever got back to me. I thought that was strange, since the time capsule included small items that could be easily lost or destroyed.

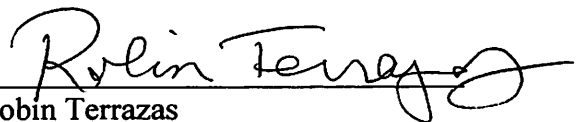
“I and our members are upset we were not notified about the time capsule or its contents. I told City personnel, including the Mayor, that the time capsule was part of the monument and we should discuss it. We would ordinarily have a ceremony when a time capsule is opened. Opening a time capsule is a significant historical event for any UDC chapter. We are a historical, heritage society. Opening a time capsule is part of our mission. We were deprived of that opportunity by the negligence of the City.

“I appreciate that other persons who are not members of the UDC may not appreciate our devotion to something like a time capsule and its historical contents. But, we ask that local governments, like the City of San Antonio, respect our beliefs and values, even if they may not share them.

“Attached is a correct copy of an email dated Sept. 5, 2017. I sent this email to the City telling them about the time capsule. I was concerned because the time capsule contained small objects that could be lost or stolen. We should have been involved in the recovery of that time capsule to ensure nothing happened to the contents.”

"I declare under penalty of perjury that the above statement is true and correct. I have been given an opportunity to review this statement and to make any necessary changes."

Signed on 12-21, 2017.


Robin Terrazas
President
Albert Sidney Johnston Chapter No.
2060
Daughters of the Confederate
Veterans

From: Robin Terrazas <robintrmusic@aol.com>

To: ron.Nirenberg <ron.Nirenberg@sanantonio.gov>; bruce.davidson <bruce.davidson@sanantonio.gov>;
Maria.cesar <Maria.cesar@sanantonio.gov>; citymanager <citymanager@sanantonio.gov>

Subject: UDC Monument belongs to our chapter, not the city

Date: Tue, Sep 5, 2017 1:02 pm

Mayor Nirenberg,

The one and only time you have acknowledged my attempts to reach you was the night prior to your vote regarding the UDC monument in Travis Park. You shook my hand and assured me you would include us in the relocation of the monument. The next day you voted to move it and immediately began the process without any communication with me. Though you may have had the right to no longer house the monument at Travis Park (which is still questionable considering no proof of deed was ever produced), you did not have the right to move it without coordination with the UDC chapter in San Antonio who was named successor of the Barnard Bee chapter that placed the monument. Our organization was given permission by the city in 1899 to place the monument which it paid for (both the monument and all costs associated with placement). At no time was the monument given to the city. Furthermore, as I have communicated to your policy advisor by voicemail the night of removal and the following morning, there is a time capsule that rightfully belongs to us that should not be disturbed without our planning and involvement. I have also communicated this to you via email on Friday as crews continued working on the removal. No one has answered my concerns. I do not believe the city has the right to decide what happens to the monument and must be held responsible for it remaining in good condition. I feel it is important that our organization is allowed to see the monument to assess its condition. Any further movement of the monument should be coordinated with the Albert Sidney Johnston 2060 chapter of the UDC and paid for by the city who prematurely moved it. I have most recently tried calling your office this morning with no response from you.

Robin Terrazas
Chapter President, Albert Sidney Johnston 2060, UDC
210-273-7418